

## **DRAFT PLANNING POLICY STATEMENT 22 (PPS22): RENEWABLE ENERGY**

### **A submission from the Countryside Agency**

#### **Background**

1. The Countryside Agency welcomes the opportunity to comment on draft PPS 22. We set out a number of comments below, based on our experience of coordinating the Community Renewables Initiative and through our promotion of the links between renewable energy and countryside character.

2. The Countryside Agency promotes a vision of a high quality of life for people in the countryside and a high quality countryside that everyone can enjoy. We advocate a strong planning system that protects and enhances the countryside as a national asset and encourages the types of sustainable development that are 'good enough to approve'. Our planning statement *Planning Tomorrow's Countryside* (2000), is available at [www.countryside.gov.uk](http://www.countryside.gov.uk).

3. Our comments below are set within the context of three main points.

- The character of the landscape must be a major factor in the determination of planning proposals for renewable energy developments.
- Evidence suggests that the use of a sequential test in siting renewable energy proposals would help achieve more capacity, not less.
- Designated Areas, including National Parks and Areas of Outstanding Natural Beauty (AONBs), should receive stringent protection but might, in the right conditions, be able to support small scale renewable energy schemes.

#### **The Government's Objectives**

4. **Third paragraph, second indent.** The protection of the environment is not restricted solely to the reduction of greenhouse gases. It also includes the protection of fine landscapes.

5. **Third paragraph, fourth indent.** The draft PPS states that renewable energy projects can help the diversification of rural economies. To give a more complete perspective on this issue, we suggest the following alternative wording:

*Renewable energy developments can help the diversification of rural economies where they have genuine links to other activities and businesses in the locality. Care must be taken to avoid adverse impact on those rural enterprises that rely on the undeveloped countryside for part of their asset base.*

## Key Principles

6. **Paragraph 1(i)** uses the phrase, ‘environmental and other impacts’. For clarity PPS22 should refer to *environmental, economic, and social impacts*.

7. **Paragraph 1(ii)** needs to emphasise the importance of a full contextual background for setting renewable energy policies. The phrase ‘... should contain policies designed to promote and encourage, rather than restrict ...’ will not allow regional and local authorities to set out a full range of criteria for guiding and judging applications. The first sentence needs revising as follows:

*Regional planning guidance and development plans should contain policies which set out opportunities, conditions, constraints and capacity for the development of renewable energy resources.*

8. In this way, the full range of criteria would signal as precisely as possible:

- *Opportunities for development*, indicating the type and scale of renewable energy development that can be accommodated;
- *Conditions* which would allow development to take place, such as design, scale and spacing;
- *Constraints* on development - perhaps the presence of a designated landscape or particularly sensitive factors identified and justified through landscape character assessment;
- *Capacity* - the general capacity of an area for renewable energy development, applied to different scales of activity and informed by landscape character assessment.

9. **Paragraph 1(iii)** requires renewable energy policies to be criteria-based. It is important that a full range of criteria -see our point in paragraph 1(ii) -for guiding and judging applications is set out by regional and local authorities.

10. **Paragraph 1(iv)** states that the ‘wider environmental and economic benefits’ of renewable energy projects are material considerations that should be given ‘significant weight’ in planning decisions. But in an earlier section, the draft PPS also promotes the government’s objectives for sustainable development which, we are advised, are to be pursued together at all times. The government’s integrated approach to sustainable development should be followed rather than breached in PPS22.

11. **Paragraph 1(vi)** seeks to increase community involvement in renewable energy projects and to ‘promote knowledge of and greater acceptance by the public of prospective renewable energy developments that are appropriately located’. We support a stronger community involvement in planning matters but, in addressing education and public acceptance, the PPS is moving far beyond the scope of the planning system. If,

however, this educational message is deemed appropriate for a PPS, then it should apply equally to the promotion of energy conservation – in which case, regional and local planning authorities should include policies for minimising the consumption of energy in all their relevant plans and strategies.

12. **Paragraph 1(vii)** requires development proposals to demonstrate any ‘environmental, economic, and social benefits’ as well as how any ‘environmental and social impacts’ have been minimised. For consistency, the latter requirement needs to include *economic* impacts as well.

### **Regional targets**

13. **Paragraph 3** states that reaching or passing a renewable energy target should not be used as a reason for refusing further planning permissions. This seems to indicate that the target has little meaning in the first place.

14. **Paragraph 5** addresses offshore wind. The Secretary of State for Trade and Industry announced in DTI Press Release P/2003/403 14 July, that offshore wind would contribute over half of the 2010 renewable energy target, yet paragraph 5 calls for the offshore quota to be ignored in setting onshore targets. Given the scale of the target to be covered by offshore wind, we recommend that the final PPS clarifies the context of targets in relation to the statement above.

### **Policies in regional planning guidance and development plans**

15. **Paragraph 6** states that specific sites for renewable energy should be allocated only where they have already been confirmed by a developer as being viable, and are likely to be brought forward during the plan period. In a plan led system this cannot be a valid procedure for planning authorities to adopt. While planning authorities must be realistic about site allocations, the planning system should not simply follow a developer’s agenda.

16. **Paragraphs 6 and 7** set out requirements for criteria based policies. We fully support a criteria based approach and we welcome the statement that planning authorities should focus only on a number of key criteria in determining applications. Landscape character should be included in PPS22 as key criterion. Evidence shows that it is already a major factor in the majority of wind turbine and biomass applications, and it should remain so.

17. Guidance on the use of landscape character assessment in planning for renewable energy schemes will be essential. The Countryside Agency and Scottish Natural Heritage have published general joint advice, *Landscape Character Assessment: Guidance for England and Scotland* (2002) but there is scope to tailor the approach for particular use in renewable energy schemes.

18. Landscape character assessment is a useful tool for determining where renewable energy schemes might be best located. Sometimes - and inevitably - it will indicate areas

where the sensitivity of the landscape is likely to yield an output below the target set by the regional renewable energy strategy. This does not mean that landscape character assessment is a negative approach: rather, in such circumstances it provides a useful opportunity to reassess how targets might be reached. This might be to propose a greater proportion of development in less sensitive locations; or to alter the mix of technologies.

19. Landscape character assessment is already well referenced but associated guidance for renewable energy will be needed to cover three specific areas.

- Providing baseline information on the capacity of the landscape for renewable energy schemes; criteria to identify areas of search; the opportunities and constraints indicated by the character of the landscape; design factors; and the conditions necessary to ensure a satisfactory development.
- Evaluating landscape sensitivity, to include factors such as acknowledged areas of landscape, historical or ecological value; the extent of current development; historic and cultural associations, the degree to which the public cherish the landscape; and its tranquillity and wildness.
- Evaluating visual influence, which should include criteria that cover the zone of visual influence of renewable energy schemes; landscape character; the scale of development; its siting, design and colour; the cumulative impact; weather and prevailing light conditions; the effect of distance; and the perceptions of the public.

### **Locational considerations**

20. *International Designated Sites.* **Paragraph 8** should include World Heritage Sites, which require the same stringent policies as international nature conservation sites.

21. *National Designations.* **Paragraphs 9 and 10** offer protection for nationally designated areas, which we welcome. We support the intent of Paragraph 10 but the final sentence should be rephrased as:

*Small- scale developments, as defined in criteria by planning authorities, should be permitted within designated areas such as National Parks, AONBs, and Heritage Coasts, provided that the developments – individually or cumulatively - do not damage the objectives of designation.*

22. Our recent statements on wind energy in designated areas (which do not necessarily apply to all forms of renewable energy) are set out in Box 1.

### Box 1.

The Countryside Agency recommends the following approach to wind energy in designated areas. We seek:

*.... a presumption against commercial wind energy developments in designated areas, because in most circumstances such schemes will constitute 'major development' and will be incompatible with the objectives of designation. However, the character of the countryside in some parts of designated areas may mean that small scale commercial wind energy schemes could be accommodate where they do not compromise the objectives of designation and where they respect the local countryside character.*

*Where the specific countryside character of a location in a designated landscape may accommodate a form of commercial wind energy, schemes of between one and three turbines, ranging up to 500kW (in the order of 60 metres height to blade tip) may be appropriate, provided that the zone of visual impact does not adversely affect the neighbouring countryside character. Where more than one scheme may be possible, these should be in the order of 12 kilometres apart. Because much will depend on the precise countryside character and its extent into the zones of visual impact of the proposals, these are indicative parameters, not definitive. The effect of related infrastructure, such as grid connections, on countryside character must also be considered within the above parameters.*

23 *Green Belts.* **Paragraph 11** notes that Green Belt locations may be appropriate for renewable energy development where it does not damage the Green Belt objectives – but the phrasing of the last sentence is likely to open the floodgates for this form of application.

24. *Buffer zones.* **Paragraph 12** should note that changes to the immediate setting of international and nationally designated sites could affect the objectives of their designation. While crude buffer zones should be avoided as the draft indicates, PPS22 needs to recognise that, in some situations, criteria based policies might demand stringent conditions (with appropriate justification) for proposals adjacent to designated areas. In many such cases, the indicative parameters identified in Box 1 will be appropriate. Much will depend on the intervisibility with the designated area and the precise character of the countryside.

25. *Other locational considerations.* **Paragraph 13** should absorb the conclusions of the DTI Foresight report (Brook-Smith, 2000), which investigated a sample of wind and hydro decisions in the planning system. Its main recommendation for achieving more planning approvals for renewable energy schemes was the introduction of a sequential approach to such applications. In this way, we maintain that a straightforward series of locational priorities for planning renewable energy schemes should include:

- *First priority:* brownfield sites - for example, present and former industrial and port-related sites. There may be scope for large-scale schemes in these locations where the environment is already degraded. Where such sites are proposed in the countryside, care must be taken to ensure that continued development on such sites remains appropriate to its locality.

- *Second priority:* less sensitive countryside sites – those which embrace few features or characteristics of valued countryside character. For example, on the edge of towns, and in intensive farmland where many traditional countryside features have been removed.
- *Third priority:* sensitive countryside sites with features and characteristics which are sensitive to renewable energy schemes. Limits on the number and size of proposals and the relative distance between them could enable some development to occur.
- *Fourth priority:* very sensitive sites – those which would experience fundamental difficulties in accommodating many forms of renewable energy scheme because their features and characteristics are likely to be highly sensitive to this form of development. These areas will tend to include the more upland and wilder tracts of land. Such areas are valued for their environmental and amenity value, and are vital economic assets to the nation. They are our non-renewable landscapes.

26. This approach could meet all the Government’s objectives for sustainable development and it would help to achieve real progress in meeting the renewable energy targets. It would also provide more certainty for developers, while helping to ensure that England’s wildest landscapes can remain a vital asset for the economy and as a part of the quality of life.

27. **Paragraph 14** seeks opportunities to include renewable energy projects in proposals for ‘large scale new development’. This, while welcome in itself, is too narrow. Local authorities should encourage all development – new or renewal, and of any scale - to accommodate renewable energy and energy efficiency measures.

### **Other considerations**

28. *Visual Effects.* **Paragraphs 15-17** should note the effect of some forms of renewable energy (particularly wind turbines) on the countryside; and they should make the character of the landscape main factor in determining proposals. Landscape character assessments should be used to inform criteria based policies and should provide a context for decisions. Such assessments would allow planning authorities, developers and other stakeholders to address visual effects and landscape character in a comprehensive way. The site-by-site approach advocated in the draft will be inefficient for all parties.

29. *Noise.* **Paragraph 18** does not cover infrasound from wind turbines. This should be a key factor in determining minimum distances between turbines and homes. The Defra Low Frequency Noise Study (Leventhall, 2003) is a good reference point.

30. **Missing factors.** The draft does not address the effect of renewable energy proposals on:

- water quality and water resources;
- horses and horseriders where proposals are located too close to public bridleways, (a recent Countryside Agency statement - for wind energy - is set out in Box 2).

**Box 2.**

*Horses are prey animals and so take flight at a sign of danger, meaning they can be difficult to control. Wind turbines can be disturbing to horses and therefore dangerous to riders and the public because:*

- *the noise, which is sometimes said to be felt rather than heard, can be frightening to horses especially where they cannot see its source;*
- *shadow flicker caused by the turbines can startle horses and make them difficult to control;*
- *turbines may suddenly appear within a horse's sight-line when the turbines are located on undulating ground; and*
- *there may be a risk of flying objects such as ice from the blades.*

*These issues are relevant to any bridleway close to wind turbines. They are especially relevant to the Pennine Bridleway, which has been created [as] ... a safe route for riders.*

*Rather than having a precise distance [between a wind turbine and a bridleway], a rule of three times the height of the turbine to blade tip from the bridleway should be used as the minimum distance.*

**Initial/partial regulatory impact assessment**

31. **Paragraph 17** would benefit from an additional point relating to the business sector, to be inserted between the fourth and fifth sentences.

*It is also recognised that renewable energy schemes might have a negative impact on tourism. Many types of tourism depend greatly on an attractive countryside for their success, and enterprises can be damaged when renewable energy development changes the character of the countryside.*

Countryside Agency

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